

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:) Case No. 14-41453-659
Lakeith Davis)
)
) Chapter 13
)
Debtor-Movant.) Debtor's Motion to Modify and Set Reasonable
) Security Deposit Pursuant to 11 U.S.C. § 366(b)
vs.)
) Motion No. _____
Laclede Gas Company,)
)
Respondent.) RESPONSE DUE: (30 days from DOF)
)

**DEBTOR'S MOTION TO MODIFY AND SET REASONABLE SECURITY DEPOSITS
PURSUANT TO 11 U.S.C. § 366(b) AND NOTICE OF HEARING**

PLEASE TAKE NOTICE: ANY RESPONSIVE PLEADING IN OPPOSITION TO THIS MOTION/PLEADING MUST BE FILED IN WRITING NO LATER THAN THIRTY (30) DAYS FROM THE DATE OF SERVICE OF THIS MOTION/ PLEADING AS SHOWN ON THE CERTIFICATE OF SERVICE. (See L.B.R. 9013-1 b.; 9061-1 B) THE RESPONSE MUST BE IMMEDIATELY SERVED UPON THE UNDERSIGNED AND UPON ALL ENTITIES DESCRIBED IN L.B.R. 9013-1 A. THE COURT MAY GRANT THE MOTION/PLEADING WITHOUT FURTHER NOTICE TO ANY PARTY UPON EXPIRATION OF THE RESPONSE PERIOD IF NO RESPONSE IS FILED.

IF A RESPONSE OR OBJECTION IS FILED, THE MOVANT, APPLICANT OR CLAIM OBJECTOR SHALL SET THE MATTER FOR HEARING AND PROVIDE NOTICE THEREOF TO THE RESPONDENT AND ALL ENTITIES DESCRIBED IN L.B.R. 9013-1 A.

COME NOW Debtor, Lakeith Davis, pursuant to 11 U.S.C. § 366(b), and for his Motion to Modify and Set Reasonable Security Deposits, state to the Court as follows:

1. The Debtor filed this Chapter 13 case with the Court on or about March 4, 2014.
2. The Debtor has an account with the public utility company *Laclede Gas Company* for utility service at the Debtor's principal residence located at 649 Baden, St. Louis, MO 63147.

3. Said utility company has become aware of the Debtor's pending bankruptcy and is presently demanding a deposit in an excessive sum for the Debtor's continued utility service.

4. Debtor submits that imposing such a deposit is unreasonable under the circumstances.

5. Debtor submits that a reasonable deposit for the utility company is \$100.00 payable at a rate of \$20.00 per month.

WHEREFORE, the Debtor prays this Court enter an Order granting Debtor's Motion to Modify and Set Reasonable Security Deposits Pursuant to 11 U.S.C. § 366(b); and for such other and further relief as the Court deems necessary and proper in the circumstances.

Respectfully Submitted
THE BANKRUPTCY COMPANY

/s/ *David N. Gunn*

David N. Gunn, #54880MO
James J. Haller # 42003MO
2025 S Brentwood Blvd., Ste. 206
St. Louis, MO 63144
Tel: 314-961-9822
Fax: 314-961-9825
stlouis@tbcwam.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of Debtor's Motion to Modify and Set Reasonable Security Deposit were served pursuant to L.B.R. 3015-5(B)(1) via either ECF or first-class mail, postage prepaid, on this 19th day of May, 2014 to the persons listed below:

/s/ Meagon Bradley
Meagon Bradley

Mr. John V. LaBarge, Jr.
P.O. Box 430908
St. Louis, Missouri 63143

Laclede Gas
Attn: Bankruptcy Department
720 Olive Street, Rm 1215
St. Louis, MO 63101
(Money Order Enclosed)

Laclede Gas Company
Attn: Mary CaolaKullman
720 Olive Street
St. Louis, MO 63101

Lakeith Davis
649 Baden
St. Louis, MO 63147